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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MONTEVILLE SLOAN, JR., RAUL
SIQUEIROS, TODD AND JILL CRALLEY,
JOSEPH BRANNAN, LARRY GOODWIN,
MARC PERKINS, DONALD LUDINGTON,
THOMAS SHORTER, DERICK BRADFORD,
GABRIEL DEL VALLE, KEVIN HANNEKEN,
EDWIN AND KATELYN DOEPEL, DAN
MADSON, JAMES FAULKNER, JOSEPH
OLIVIER, SCOTT SMITH, ROSS DAHL,
DREW PETERSON, MICHAEL WARE,
STEVE KITCHEN, JOHN NEUBAUER,
BARBARA MOLINA, DENNIS VITA,
STEVEN EHRKE, BILL MAUCH, THOMAS
GULLING, RONALD JONES, MIKE
WARPINSKI, JOHN GRAZIANO, JOSHUA
BYRGE, RUDY SANCHEZ, CHRISTOPHER
THACKER, RANDY CLAUSEN, KELLY
HARRIS, JAMES ROBERTSON, and JONAS
BEDNAREK, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.: 16-cv-07244-EMC

**STIPULATION AND ~~PROPOSED~~ ORDER
RE TIMING OF FILING THIRD AMENDED
COMPLAINT**

1 **WHEREAS**, in its Order Granting In Part and Denying In Part Defendant's Motion to Dismiss
2 Second Amended Complaint (the "Order," Dkt. No. 99), the Court granted Plaintiffs leave to file an
3 amended complaint by March 9, 2018;

4 **WHEREAS**, Plaintiffs intend to file a Third Amended Complaint to address issues raised in the
5 Order;

6 **WHEREAS**, Plaintiffs seek leave to add a new plaintiff to the Third Amended Complaint;

7 **WHEREAS**, Plaintiffs' counsel requires additional time to confer with certain of Plaintiffs to
8 address certain issues raised in the Order;

9 **IT IS HEREBY STIPULATED**, by and between Plaintiffs and GM, by their undersigned
10 counsel, that, subject to the approval of the Court, Plaintiffs may file their Third Amended Complaint by
11 March 23, 2018, with leave to add one or more new plaintiffs.

12
13 Dated: March 9, 2018

14 /s/ Adam J. Levitt

15 Adam J. Levitt (*pro hac vice*)

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21 *Counsel for Plaintiffs and the Proposed*
22 *Classes*

14 /s/ Joseph J. Ybarra

15 Joseph J. Ybarra

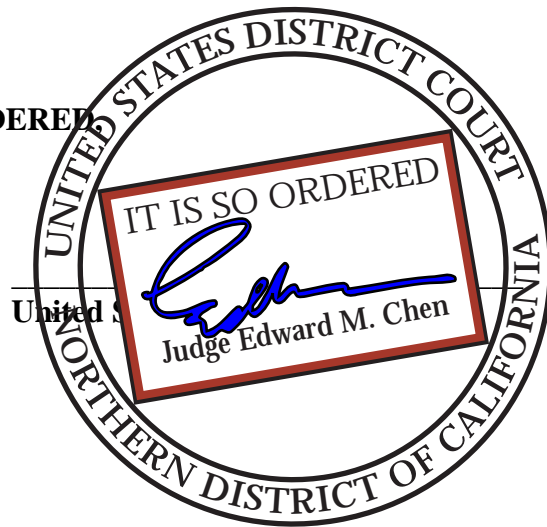
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26 *Counsel for General Motors LLC*

1 PURSUANT TO STIPULATION IT IS SO ORDERED

2
3 Dated: March 9, 2018



1 **ECF CERTIFICATION**

2 Pursuant to Civil L.R. 5-1(i)(3), the filing attorney attests that he has obtained concurrence
3 regarding the filing of this document from the signatories to the document.
4

5 Date: March 9, 2018

By: /s/ Jennie Anderson
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